<u>Alternative 1 – Berthed in-Place</u>

Under this alternative, the vessel would remain berthed at its present location. The contaminants of concern, including non-friable asbestos and paint and insulation wiring containing greater than or equal to 50 parts per million (ppm) of polychlorinated biphenyls (PCBs), would not be removed under this alternative nor would any residual water, oil, and greases remaining on the interior surfaces or in equipment and machinery be removed. The hatches/doors and port holes would be welded shut to prevent unauthorized access to the interior of the vessel. Any loose debris on the upper deck and superstructure, including equipment or materials not permanently attached to the vessel would be removed or permanently secured to the vessel. The vessel's hull would be evaluated to determine whether there are any holes that must be repaired to prevent the movement of water in and out of the vessel. The vessel mooring would be evaluated to determine if it must be secured further to ensure it remains berthed at its current location and to discourage unauthorized access. Additionally, hazard notices would complement the access controls by warning the public that residual contamination remains within the vessel

Individual Analysis

A. Effectiveness

Under this alternative, the immediate human health threats posed by exposure to contaminants found within the vessel are eliminated because access to the interior of the vessel would be restricted and threats to the marine environment are eliminated because holes in the hull would be patched. However, because the hazardous substances would remain untreated and contained within the vessel, there is no reduction of contaminant toxicity or volume through treatment. There would likely be minimal short-term impacts to workers, the community, and the environment during conduct of this alternative, and this alternative could be implemented in a relatively short timeframe. An inspection, maintenance, and monitoring plan would be developed and implemented to assure the continued adequacy and integrity of the cleanup action including containment and hazard notices warning of the asbestos and PCBs remaining within the vessel. Additionally, the vessel would likely remain an attractive nuisance, a potential navigational hazard, and pose adverse aesthetic and visual impacts.

B. Implementability

This alternative is readily implementable because of the technical ease of restricting access to the vessel, removing debris and/or welding equipment to the vessel, and evaluating the vessel's hull and making repairs, if required. The necessary equipment and personnel are likely readily available to perform the required services. The alternative may require approval from other local Agencies to continue to berth the vessel at its current location, and the access restriction and hazard notices would minimize the potential for human and ecological exposure to contamination by providing overlapping assurances of protection from contamination. However,

the USCG would remain responsible for the long-term adequacy and reliability of this alternative for continued protection from residual contamination contained within the vessel.

C. Cost